



**Consumer Electronics Association**

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October 6, 2004

VIA ECFS

Ms. Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: *Ex Parte* Communications in CS Docket 97-80

Dear Ms. Dortch:

This is to notify you that on October 5, 2004, Peter Fannon, chairman, CEA Video Division Board (Panasonic/Matsushita), Adam Goldberg (Sharp Laboratories of America, Inc.), and the undersigned, met with Johanna Mikes Shelton, Legal Advisor to Commissioner Adelstein.

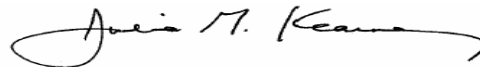
We discussed “plug and play” issues and the consumer electronics industry’s view that the FCC’s requirement for all products -- including cable operator supplied products -- to use separable security (e.g., CableCARDS™) should be maintained, and that the July 1, 2006 deadline for cable operators’ compliance (47 C.F.R. Section 76.1204) should be maintained as currently written.

The CEA representatives indicated, in response to the September 30, 2004, *ex parte* filing of NCTA on this subject, that the only way to ensure actual competition in the marketplace -- thus ensure that the benefits of competitive choice, features, and cost in home cable equipment actually reach consumers, as the FCC indicated is the goal of its 1998 Order -- is the reliance, in cable-operator-supplied devices, on the same separable security mechanism (*i.e.* CableCARD) made available to competitive equipment suppliers, as is provided for in the existing regulations. Some of these benefits are described in the enclosed article from “Sound & Vision” magazine (October 2004), which was provided by the CEA representatives in the meeting. In addition, although the original date for cable operators to begin reliance on CableCARD in their new equipment was already slipped by 18 months (to July 1, 2006), the sooner CableCARD becomes ubiquitous in all new cable equipment, the sooner the cost of implementation falls with volume, and the sooner the full benefits of the nation’s transition to digital television is accomplished in cable subscriber households – the majority of all television homes.

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This letter is being provided to your office in accordance with Section 1.1206 of the Federal Communications Commission rules. A copy of this letter has been delivered by e-mail to Ms. Mikes Shelton.

Very truly yours,

A handwritten signature in black ink, appearing to read "Julie M. Kearney", with a long, sweeping horizontal flourish extending to the right.

Julie M. Kearney  
Senior Director, Regulatory Affairs

Attachment

cc: Johanna Mikes Shelton